



19 March 2014

Jill Hewitt  
Senior Adviser Listings Compliance (Perth)  
Australian Securities Exchange  
Exchange Plaza  
2 The Esplanade  
PERTH WA 6000

Dear Jill

**PRICE & VOLUME QUERY**

We refer to your letter dated 18 March 2014 received at approximately 9.50am (WST).

As requested please find below the Company's response to the questions from ASX:

1. No, the Company is not aware of any additional information which, if known, could be an explanation for recent trading in the securities of the Company. However the Company would like to refer to the Company's ASX announcements regarding the recently completed drilling campaign in Vietnam, and associated cost overruns and contingent liabilities. As disclosed we are currently in negotiations with Operator Eni to determine final costs and Neon's remaining financial obligation. We anticipate being in a position to advise the market of the outcome of those discussions in due course. As a result of the current contingent liability, Neon Energy believes that shares may have been oversold in the market with the share price reaching a low of 2.2 cents on 12 March 2014. The recent price and volume increase may be associated with recognition of this overselling in the market.

The Company is preparing for all possible outcomes further to the final determination of its financial obligation associated with the Vietnam drilling campaign, and to that end, various options remain on the table. The chosen path forward will be announced at the conclusion of a strategic review of those options which is ongoing. This review includes possible asset divestment to ensure that Neon attains a strong balance sheet and effective working capital to conduct its core business functions.

Besides the information disclosed in our recent Preliminary Final Report update on 28 February 2014 and above, there has not been any material event or changes in the Company's affairs.

2. Not applicable.
3. Not that the Company is aware.
4. Yes, the Company is in full compliance with the listing rules.

Yours sincerely

A handwritten signature in black ink, appearing to read 'G. Chiappini', with a stylized flourish at the end.

**GABRIEL CHIAPPINI**  
*Company Secretary*



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18 March 2014

Mr G Chiappini  
Company Secretary  
Neon Energy Limited  
Ground Floor, 88 Colin Street  
WEST PERTH WA 6005

By Email: [gabriel@laurus.com.au](mailto:gabriel@laurus.com.au)

Dear Gabriel

### Neon Energy Limited (the “Company”) - ASX price query

We have noted a change in the price of the Company's securities from a closing price of 2.3 cents on 17 March 2014, to an intra-day high of 3.8 cents. We have also noted an increase in the volume of trading in Company's securities over this period.

In light of the price and volume change, ASX asks you to respond separately to each of the following questions:

1. Is the Company aware of any information concerning it that has not been announced to the market which, if known by some in the market, could explain the recent trading in its securities?
2. If the answer to question 1 is “yes”:
  - a) Is the Company relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?

Please note that the recent trading in the Company's securities would suggest to ASX that such information may have ceased to be confidential and therefore the Company may no longer be able to rely on Listing Rule 3.1A. Accordingly, if the answer to this question is “yes”, you need to contact us immediately to discuss the situation.
  - b) Can an announcement be made immediately?

Please note, if the answer to this question is “no”, you need to contact us immediately to discuss requesting a trading halt (see below).
  - c) If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?
3. If the answer to question 1 is “no”, is there any other explanation that the Company may have for the recent trading in its securities?
4. Please confirm that the Company is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

### When and where to send your response

This request is made under, and in accordance with, Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by no later than **11:30am (WST) on Tuesday, 18 March 2014**. If we do

not have your response by then, ASX will have no choice but to consider suspending trading in the Company's securities under Listing Rule 17.3.

You should note that if the information requested by this letter is information required to be given to ASX under Listing Rule 3.1 and it does not fall within the exceptions mentioned in Listing Rule 3.1A, the Company's obligation is to disclose the information "immediately". This may require the information to be disclosed before the deadline set out in the previous paragraph.

ASX reserves the right to release a copy of this letter and your response on the ASX Market Announcements Platform under Listing Rule 18.7A. Accordingly, your response should be in a form suitable for release to the market.

Your response should be sent to me by e-mail at [jill.hewitt@asx.com.au](mailto:jill.hewitt@asx.com.au). It should not be sent directly to the ASX Market Announcements Office. This is to allow me to review your response to confirm that it is in a form appropriate for release to the market, before it is published on the ASX Market Announcements Platform.

### **Listing Rule 3.1**

Listing Rule 3.1 requires a listed entity to give ASX immediately any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity's securities. Exceptions to this requirement are set out in Listing Rule 3.1A.

The obligation of the Company to disclose information under Listing Rules 3.1 and 3.1A is not confined to, nor is it necessarily satisfied by, answering the questions set out in this letter.

In responding to this letter, you should have regard to the Company's obligations under Listing Rules 3.1 and 3.1A and also to Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B*.

### **Trading halt**

If you are unable to respond to this letter by the time specified above, or if the answer to question 1 is "yes" and an announcement cannot be made immediately, you should discuss with us whether it is appropriate to request a trading halt in the Company's securities under Listing Rule 17.1.

If you wish a trading halt, you must tell us:

- the reasons for the trading halt;
- how long you want the trading halt to last;
- the event you expect to happen that will end the trading halt;
- that you are not aware of any reason why the trading halt should not be granted; and
- any other information necessary to inform the market about the trading halt, or that we ask for.

We may require the request for a trading halt to be in writing. The trading halt cannot extend past the commencement of normal trading on the second day after the day on which it is granted.

You can find further information about trading halts in Guidance Note 16 *Trading Halts & Voluntary Suspensions*.

If you have any queries or concerns about any of the above, please contact me immediately.

Yours sincerely

*[Sent electronically without signature]*

Jill Hewitt  
**Senior Adviser, Listings Compliance (Perth)**